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October 10, 2024

USDC SDNY  
DOCUMENT  
ELECTRONICALLY FILED  
DOC#:  
DATE FILED: 11/12/24

**VIA ECF**

The Honorable Andrew L. Carter Jr., U.S.D.J.  
United States District Judge  
United States District Court  
for the Southern District of New York  
40 Foley Square, Room 435  
New York, New York 10007

**Re: United States of America v. Yu, et al., 20-cr-00648-ALC**

Dear Judge Carter:

We represent defendant Valeria Ruth Hacohen (“Hacohen”) in the above-referenced matter. We write now to request that the Court permit Ms. Hacohen to renew her Israeli passport that is set to expire shortly, and approve her travel plans from December 15, 2024 through January 5, 2025 to take her children back to Israel as part of her divorce agreement with her former husband.

Ms. Hacohen needs her Israeli passport returned so that she can obtain a renewal from the Israeli consulate in New York. Once she obtains the old passport from United States Pretrial Services, she needs to request a meeting at the Israeli consulate with her children being present. After this interview at the Israeli consulate, the passport renewal process will take 3 to 4 weeks to have the new passport returned to her from the Israeli consulate. After obtaining the renewed passport, Ms. Hacohen will return it to United States Pretrial Services so that they may maintain it as they have since the initial bail conditions were laid down over 4 years ago. It is likely Ms. Hacohen will be able to return her renewed Israeli passport to United States Pretrial Services by the beginning of November 2024.

Additionally, we are also requesting permission so that Ms. Hacohen be allowed to travel back to Israel with her children for period beginning December 15, 2024 through January 5, 2025 to satisfy her obligations under her divorce agreement with her former husband. That is, she is required pursuant to Israeli court order to return the children to Israel at regular intervals. We do note this travel is conditioned upon the situation in the Middle East, and, given the unpredictability of that area, it is possible (as it was the last time we made such a request and the Court granted it) the trip will not occur.

We notified the United States Attorney’s Office for the Southern District of New York and United States Pretrial Services on or about September 27, 2024 of this request. United States Pretrial Services took no position, and we have yet to hear from the Government on this request.

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We needed to submit this request to the Court given the time considerations involved in renewing Ms. Hacoheh's passport.

We thank the Court for its consideration of this matter.

Respectfully submitted,



Ernest Edward Badway

cc: All Counsel (via ECF)

The application is **GRANTED**.  
So Ordered.

  
11/12/24